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**STATE OF SOUTH CAROLINA  
IN THE  
COURT OF APPEALS**

Appeal from the Administrative Law Court  
Honorable Deborah B. Durden, Administrative Law Judge  
Docket No.: 15-ALJ-07-0405-CC  
**Appellate Case No.: 2017-001977**

**RECEIVED**

MAR 30 2018

**SC Court of Appeals**

Appellant,

SOUTH CAROLINA COASTAL CONSERVATION LEAGUE,

v.

SOUTH CAROLINA DEPARTMENT OF HEALTH AND  
ENVIRONMENTAL CONTROL and DBBO, LLC,

Respondents.

**RESPONDENT, DBBO, LLC's MOTION FOR EXTENSION OF TIME  
TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER**

Stephen P. Groves, Sr., Esquire  
S.C. Bar. No.: 007854  
Mary D. Shahid, Esquire  
S.C. Bar No.: 001794  
Angelica M. Colwel, Esquire  
S.C. Bar No.: 073188  
**NEXSEN PRUET, LLC**  
205 King Street, Suite 400  
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*Attorneys for the Respondent, DBBO, LLC*

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS:

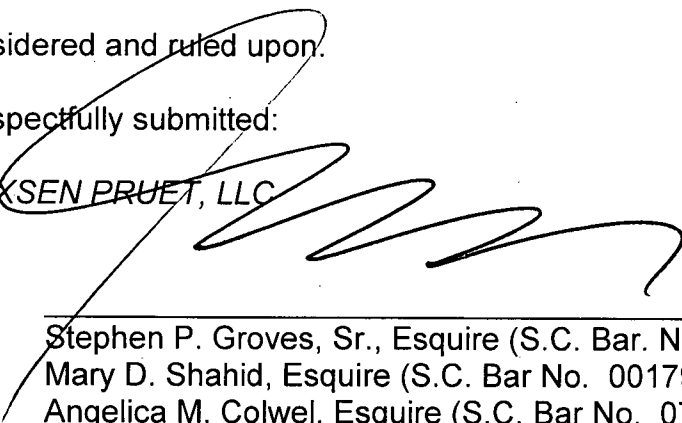
COMES NOW the Respondent, DBBO, LLC, pursuant to Rule 240 of the South Carolina Appellate Court Rules, and respectfully requests this Court of Appeals to grant it a thirty-day extension of time in which to file DBBO's *Initial Brief of Respondent* and the *Designation of the Matters to be Included in the Record on Appeal*.

The basis for this motion is that DBBO's appellate counsel are involved in other appellate and trial matters at this time and needs the additional time in which to complete the Initial Respondent's Brief and the DOM. Based upon the current briefing schedule Mrs. Grey's Initial Appellant's Brief and DOM are currently due on or before Wednesday, 11 April 2018. Consequently, anticipating a favorable reception and subsequent grant of this extension motion, DBBO's Initial Respondent's Brief and DOM would then be due on or before Friday, 11 May 2018. In addition, DBBO respectfully requests this Court of Appeals to hold the briefing time in abeyance until such time as this motion may be considered and ruled upon.

Respectfully submitted:

NEXSEN PRUET, LLC

By:

  
Stephen P. Groves, Sr., Esquire (S.C. Bar. No. 007854)  
Mary D. Shahid, Esquire (S.C. Bar No. 001794)  
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*Attorneys for the Respondent, DBBO, LLC*

Charleston, South Carolina

28 March 2018

**STATE OF SOUTH CAROLINA  
IN THE  
COURT OF APPEALS**

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Appeal from the Administrative Law Court  
Honorable Deborah B. Durden, Administrative Law Judge  
Docket No.: 15-ALJ-07-0405-CC  
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SC Court of Appeals

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v.

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Respondents.

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**PROOF OF SERVICE FOR RESPONDENT DBBO, LLC's  
MOTION FOR EXTENSION OF TIME TO  
FILE INITIAL BRIEF AND DESIGNATION OF MATTER**

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Stephen P. Groves, Sr., Esquire  
S.C. Bar. No.: 007854  
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Angelica M. Colwel, Esquire  
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*Attorneys for the Respondent, DBBO, LLC*

I, Stephen P. Groves, Sr., Esquire, hereby certify that on 28 March 2018, I served a copy of the **Motion for Extension of Time to File Initial Respondent's Brief and Designation of Matter** submitted by the Respondent, DBBO, LLC, on counsel for the Appellant and the Co-Respondent via the United States Mail, postage pre-paid, and addressed as follows:

Amy E. Armstrong, Esquire  
Jessie A. White, Esquire  
SOUTH CAROLINA ENVIRONMENTAL  
LAW PROJECT  
Post Office Box No. 1380  
Pawley's Island, South Carolina 29585  
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E-Mail: [amy@scelp.org](mailto:amy@scelp.org)

*Attorneys for the Appellant,  
South Carolina Coastal Conservation League*

Bradley D. Churdar, Esquire  
SOUTH CAROLINA DEPARTMENT OF HEALTH  
AND ENVIRONMENTAL CONTROL  
Office of Ocean and Coastal Resource Management  
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*Attorneys for the Respondent,  
South Carolina Department of Health and Environmental Control  
Office of Ocean and Coastal Resource Management*

Signed: \_\_\_\_\_

Stephen P. Groves, Sr.

Charleston, South Carolina

28 March 2018

NPCHAR1:2398081.1-TBF-(SPG) 056053-00001

Stephen P. Groves, Sr.  
Member  
Admitted in SC

28 March 2018

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
SOUTH CAROLINA COURT OF APPEALS  
1220 Senate Street  
Columbia, South Carolina 29201

RECEIVED

MAR 30 2018

SC Court of Appeals

Re: South Carolina Coastal Conservation League v. South Carolina Department of Health and Environmental Control and DBBO, LLC

Appeal from the Administrative Law Court

Docket No.: 15-ALJ-07-0405-CC

Appellate Case Tracking No.: 2017-01977

NP File No.: 056053-00001

Dear Ms. Kitchings:

**Charleston**

Charlotte

Columbia

Greensboro

Greenville

Hilton Head

Myrtle Beach

Raleigh

Pursuant to Rule 240, SCACR, please find enclosed the original and seven copies of a Motion for Extension of Time in Which to File Initial Respondent's Brief and DOM in the above-referenced consolidated appellate matters. I also enclose a Proof of Service indicating service of the Motion for Extension of Time in Which to File Initial Respondent's Brief and DOM and the Proof of Service upon counsel for the Respondent. Finally, I enclose our firm check in the amount of \$25.00 as payment for the filing fee.

I would greatly appreciate you filing the Motion for Extension of Time in Which to File Initial Respondent's Brief and DOM and the Proof of Service with the Court of Appeals and returning a date stamped copy of each to my attention in the enclosed self-addresses, stamped envelope.

If you need anything else or I otherwise may be of any assistance to you or to the Court of Appeals regarding this matter, please feel free to contact me at your convenience. My direct telephone number is 843.720.1725, direct telecopier is 843.414.8206, and the e-mail is [sgroves@nexsenpruet.com](mailto:sgroves@nexsenpruet.com).

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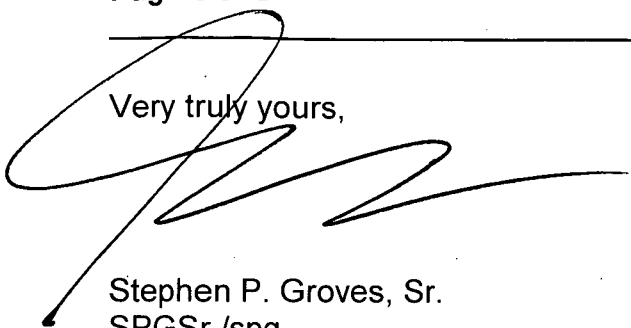
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Nexsen Pruet, LLC  
**Attorneys and Counselors at Law**



Honorable Jenny Abbott Kitchings  
Clerk of Court  
28 March 2018  
Page 2 of 2

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Very truly yours,

A handwritten signature in black ink, appearing to read "Stephen P. Groves, Sr.", written over a horizontal line.

Stephen P. Groves, Sr.  
SPGSr./spg  
Enclosures

cc: Amy E. Armstrong, Esquire  
Jessie A. White, Esquire  
Bradley D. Churdar, Esquire

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NEXSEN | PRUET

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